UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

[UNDER SEAL] 1:17 MJ 3024

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

Your Affiant, Rachel Hanley, being duly sworn, deposes and states:

**INTRODUCTION**

Affiant is an officer or employee of the United States Department of Justice (DOJ), Drug Enforcement Administration (DEA) within the meaning of Section 878(a) of Title 21, United States Code, that is an officer who is empowered by law to conduct investigations, make arrests, and seize property for violations of Title 18, United States Code and Title 21, United States Code.

Affiant is a Special Agent (SA) for the United States Department of Justice, Drug Enforcement Administration (DEA), and has been so employed since August 2010. During Affiant's employment with the DEA, Affiant has been assigned to the Eagle Pass Resident Office (EPRO) in Eagle Pass, TX, the Del Rio Post of Duty (DRPOD) in Del Rio, TX, and the Cleveland Resident Office (CRO) in Cleveland, Ohio.

**TRAINING AND EXPERIENCE**

Affiant has been involved in the investigation of various individuals and organizations involved in the manufacturing, distribution, and use of controlled substances.

Affiant has conducted surveillance operations and has become familiar with the methods used by individuals engaged in the manufacturing, trafficking, and use of controlled substances. Affiant received specialized training at the DEA Training Academy in Quantico, Virginia in regards to the identification of narcotic substances and the operation of drug trafficking organizations. Affiant has written and conducted numerous search warrants which have resulted in the seizure of large amounts of narcotics and narcotics proceeds. Affiant has also authored Title III affidavits and been the case agent on Title III investigations.

Affiant received specialized training at the DEA Training Academy in Quantico, Virginia, regarding the identification of narcotic controlled substances and the operation of drug trafficking organizations. Affiant has also been involved in the investigation of numerous individuals and organizations involved in the manufacturing, distribution, and use of controlled substances. During Affiant's employment with DEA as a Special Agent, Affiant has also worked in an undercover capacity for the purpose of purchasing and/or delivering controlled substances; and has participated in the preparation of affidavits in support of numerous search and arrest warrants for violations of federal drug laws contained in Title 21, United States Code, as well as in the execution of the same. In addition, Affiant has on numerous occasions, as a Special Agent with DEA, made seizures of contraband, conveyances, currency, drug paraphernalia, and firearms possessed or used in relation to violations of Title 21, United States Code, Section 841. Affiant has successfully conducted numerous investigations that have resulted in the arrest of numerous drug traffickers and the seizure of significant quantities of drugs and drug-related proceeds. Affiant has further conducted surveillance operations of drug traffickers and has interviewed numerous persons personally involved in drug trafficking. Affiant has also supervised numerous confidential sources during controlled purchases of narcotics. Through this training and experience, Affiant has become familiar with, and has gained a thorough understanding of the methods, manner and means used by individuals engaged in the unlawful manufacturing, trafficking, and use of controlled substances.

Affiant makes this affidavit in support of a warrant authorizing the arrest of the individual described in Attachment A. This affidavit does not contain each and every piece of information known to Affiant and other investigators, but rather only information sufficient to establish probable cause to support the requested warrant.

## BACKGROUND

1. Affiant is an investigator involved in a criminal investigation concerning **PAUL V. CRAMER.** Your Affiant has reviewed reports and evidence of, spoken with other investigators regarding, and has been involved in the investigation relating to alleged violations of federal controlled substance laws by **PAUL V. CRAMER.** Your Affiant affirms that, on or about February 3, 2017, in the Northern District of Ohio, Eastern Division **PAUL V. CRAMER**, did knowingly possess with intent to distribute controlled substances in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

## PROBABLE CAUSE

2. At approximately 12:29 p.m., agents observed **MCCAULLEY's** Jeep Cherokee arrive at the Marriott Courtyard Hotel located at [redacted] Maplegrove Road, Willoughby Hills, Ohio. Agents observed **MCCAULLEY** exit his vehicle carrying a large duffel bag. Agents observed **MCCAULLEY** enter the hotel carrying the duffel bag. A short time later, agents observed **MCCAULLEY** knock on the door of room 223. **MCCAULLEY** received no response, exited the hotel, returned to his vehicle and drove to the Texas Road House Restaurant. Agents observed **MCCAULLEY** and a black female, possibly J[redacted] M[redacted], exit the Jeep Cherokee and enter the restaurant.

3. On February 3, 2017, at approximately 12:42 p.m., agents observed the unidentified Hispanic male, female, and the child, return to the hotel and enter room 223.

4. At approximately 1:25 p.m. agents observed **MCCAULLEY's** vehicle arrive at the Marriott Courtyard Hotel. A short time later, **MCCAULLEY** entered the hotel carrying a large black duffel bag. Agents observed **MCCAULLEY** carry the same large duffel bag into room 223.

5. At approximately 1:34 p.m. agents observed **MCCAULLEY** exit the hotel without the duffel bag, return to his vehicle and depart the area.

6. On February 3, 2017, at approximately 1:39 p.m., agents observed **MCCAULLEY** arrive at the apartment located at 2210 Spruce Trail, Apartment 2, Willoughby Hills, Ohio. A short time later, the garage door went up and **MCCAULLEY**, then backed the white 2011 Jeep Wrangler out of the garage and depart the area.

7. At approximately 1:44 p.m., agents observed **MCCAULLEY** arrive at the Walgreen pharmacy located near the intersection of State Route 91 and State Route 84. Agents observed **MCCAULLEY** enter the store, purchase rubber gloves and depart the area on foot.

8. On February 3, 2017, agents observed a semi-truck bearing Texas Registration [redacted] and Maine Trailer registration number [redacted] arrive in the area. Agents observed the semi-truck arrive at the Marriott Courtyard hotel. A short time later, agents observed the unidentified Hispanic male from room 223, meet with an individual from the semi-truck. Agents observed the unidentified Hispanic male obtain a large blue duffel bag from an individual inside of the semi-truck. The male then went back inside of the hotel. At approximately 2:03 p.m., agents observed the semi-truck depart the area.

9. On February 3, 2017, agents observed **MCCAULLEY**'s Jeep arrive at the Marriott Courtyard Hotel. A short time later, agents observed the unidentified Hispanic male, female, and child exit the hotel and enter the Jeep Cherokee. Agents were unable to see if any of the individuals carried a duffel bag as they entered **MCCAULLEY's** Jeep.

10. At approximately 2:25 p.m., agents observed the semi-truck parked on the entrance ramp to Interstate 90 westbound. It should be noted that the apartment located at [redacted] Spruce Trail, Apartment [redacted], Willoughby Hills, Ohio, is located a very short distance from the freeway entrance ramp.

11. At approximately 2:20 p.m., agents observed the garage door of the apartment located at [redacted] Spruce Trail, Apartment [redacted] Willoughby Hills, Ohio, open. A short time later, agents observed **MCCAULLEY's** Jeep Cherokee enter the garage and then the garage door closed.

12. On February 3, 2017, at approximately 2:33 p.m., agents observed an unidentified individual running through the backyard of the apartment located at [redacted] Spruce Trail, Apartment [redacted] Willoughby Hills, Lake County, Ohio carrying a bag. Agents observed the unidentified male hand the bag to the individual inside of the semi-truck. The semi-truck then departed the area.

13. At approximately 3:33 p.m., Ohio State Highway Patrol Trooper Brian McGill observed the semi-truck bearing Texas Registration [redacted] and Maine trailer registration number [redacted] commit a marked lanes infraction (in violation of Ohio Revised Code 4511.33.)

14. At approximately 3:34 p.m., Trooper McGill conducted a traffic stop on the semi-truck bearing Texas Registration [redacted], and Maine Trailer registration number [redacted], on Interstate 80, west bound, near mile post 139, Amherst Township, Lorain County, Ohio.

15. During the course of the traffic stop, Trooper McGill utilized his Ohio Certified Narcotics Detection Canine "Edo" to conduct an exterior sniff of the semi- truck and trailer. Trooper McGill observed a positive alert from his Canine Partner "Edo" to the presence of the odor of narcotics in the vehicle.

16. Based on the alert of the canine, Trooper McGill conducted a search of the cab of the semi-truck, and located a large black duffle style bag on the front seat passenger seat of the truck, containing thirty-four (34) rubber banded bundles of United States Currency.

17. A continued search of the truck revealed seven (7) individually wrapped black bricks, which were located under the "sleeper" bed of the truck cab. Your Affiant conducted a presumptive test from one of the seized bricks which yielded a positive result for the presence of cocaine. A gross weight of the bricks was approximately 7.9 kilograms.

18. Trooper McGill advised Your Affiant hat he identified the driver of the truck as **ADALFO MAYA MAGADAN.** Trooper McGill read **MAGADAN** his Miranda Rights, and began to question **MAGADAN. MAGADAN** told Trooper McGill that he was traveling from Cleveland, Ohio to Chicago, Illinois for the weekend. When questioned about the U.S. currency located in the truck, **MAGADAN** stated that it was not his and someone placed it in the truck, whom he refused to identify. **MAGADAN** advised Trooper McGill that he knew nothing about the seven bricks located inside the sleeper area of his truck. **MAGADAN** then refused to answer any more questions and was processed and transported to the Lorain County Jail for detention.

19. On February 3, 2017, at approximately 4:20 p.m., agents monitored remote video surveillance in the area of the apartment located at [redacted] Spruce Trail, Apartment [redacted] Willoughby Hills, Lake County, Ohio. Agents observed an individual arrive in the area driving a Toyota Camry bearing Ohio Registration number [redacted] which is registered to [redacted] **CRAMER** on

Ronald Drive, Willowick, Lake County, Ohio. A short time later, agents observed an individual thought to be **PAUL CRAMER**, walk up to the front door of the apartment carrying what appeared to be a bag or backpack in his left hand. Agents observed **CRAMER** enter the apartment.

20. On February 3, 2017, at approximately 4:43 p.m., agents observed the garage door of the apartment located at [redacted] Spruce Trail, Apartment [redacted] Willoughby Hills, Lake County, Ohio, go up. A short time later, agents observed **CRAMER** exit the apartment carrying a white plastic bag. Agents observed **MCCAULLEY**'s Jeep Cherokee back out of the garage. A short time later, agents observed Justin McCaulley's white Jeep Wrangler pull into the garage of the apartment. Agents observed Justina McCaulley enter the front passenger's side of **MCCAULLEY**'s grey Jeep Cherokee and depart the area. Agents also observed **CRAMER**'s vehicle depart the area. At this time, Agents maintained surveillance on **CRAMER**'s vehicle from the residence to Clayton Road where it was subsequently stopped by the Willoughby Hills Police Department.

21. At approximately 4:51 p.m., Willoughby Hills Police Department K-9 Officer Shannon Vatchet was advised that **CRAMER**'s vehicle had left the residence located at [redacted] Spruce Trail, Apartment [redacted] Willoughby Hills, Ohio. From the intersection of Maplegrove and State Route 84, Officer Vatchet observed the suspect vehicle turn left out of Par Lane onto State Road 84. Officer Vatchet proceeded toward the vehicle, which was followed by DEA vehicles. Officer Vatchet observed the vehicle having blacked out windows and a rear license plate cover. Officer Vatchet followed as the vehicle turned right/north on Rockefeller Road. As the vehicle crossed over Euclid Avenue, Officer Vatchet was advised to make the traffic stop. At this point, Officer Vatchet, activated his emergency lights and conducted a traffic stop just south of Clayton Road.

22. Officer Vatchet quickly approached the vehicle on the passenger side and made contact with the operator, who was later identified as **Paul V. CRAMER**. Officer Vatchet was provided **CRAMER**'s Ohio Driver's license and asked **CRAMER** to step out of the vehicle. Officer Vatchet was assisted by an Ohio State Trooper, who stopped behind him. **CRAMER** stepped to the rear of his vehicle and Officer Vatchet patted him down for weapons and then placed him in the rear of the Trooper's vehicle. Officer Vatchet asked **CRAMER** if he was working, because he was wearing painter's pants. **CRAMER** stated he was working and Officer Vatchet asked him where, which **CRAMER** responded "Lake County." Officer Vatchet asked **CRAMER** where in Lake County and he stated that he was self-employed and the boss. Officer Vatchet then asked him again if he knew where his job site was located and then he looked at Officer Vatchet and stated that he was not working today. **CRAMER** was visibly shaking with a "white screen" look on his face, appearing physically drained. Officer Vatchet then disengaged the conversation and closed the door of the vehicle.

23. Officer Vatchet then brought Canine Razor out his kennel and on lead. Officer Vatchet introduced Razor to the suspect vehicle and gave him the command to search for narcotics. Razor and Officer Vatchet worked around the vehicle in a counter clockwise pattern. Officer Vatchet observed Razor alert with a change in breathing as he jumped up on the driver's door and he followed odor to the vehicle. Razor then indicated by sitting. Officer Vatchet rewarded Razor with a mild toned "Good Boy" and then they continued around the vehicle. Razor and Officer Vatchet came back to the driver's door and Razor again alerted and indicated to the presence of narcotics.

24. The Trooper and Officer Vatchet then began to search the vehicle. There were two cell phones on the front passenger seat and some white plastic bags on the rear seat. The white bags

contained clothing and other personal items. Located in the vehicle's trunk was a Black and Decker box, which contained approximately a kilo size brick broken in half of suspected narcotics. The narcotics were later secured in the rear of Officer Vatchet's police vehicle. Officer Vatchet notified of a K-9 alert, narcotics located, and requested a tow of the vehicle to the scene.

**25.** **CRAMER** was then brought out of the Trooper's vehicle and Officer Vatchet placed him under arrest for possession of drugs. **CRAMER** was handcuffed and sat back in the vehicle. Officer Vatchet then advised **CRAMER** of his rights, which he stated he understood. Both **CRAMER** and the vehicle were brought to the Willoughby Hills Police Department for processing.

26. A short time later, Agents of the DEA arrived at the Willoughby Hills Police Department. At this time, Agents advised **CRAMER** of his rights. **CRAMER** stated that he did not want to answer any questions without the presence of an attorney.

## CONCLUSION

Based upon the above listed facts and circumstances, Affiant has probable cause to believe, and does believe that **Paul V. CRAMER** did knowingly possess with intent to distribute approximately one kilogram of cocaine, a Schedule II narcotic controlled substance, in the Northern District of Ohio, Eastern Division, in Violation of Title 21 USC 841. Affiant therefore requests that an Arrest Warrant be issued for **Paul V. CRAMER**.

Rachel L. Hanley
Special Agent
Drug Enforcement Administration

Sworn to and subscribed before me this 6th day of February, 2017.

United States Magistrate Judge
Northern District of Ohio
Eastern Division